

COMP CG_HOCKLEY_CP_20210318_INVESTIGATION
Texas Commission on Environmental Quality
Investigation Report

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Customer: Bulldog Environmental Services LLC
Customer Number: CN605813435

Regulated Entity Name: BULLDOG ENVIRONMENTAL ANTON UNA SITE 2

Regulated Entity Number: RN111101549

Investigation # 1721972	Incident Numbers
Investigator: RYAN RHODES	Site Classification STORAGE
Conducted: 03/18/2021 -- 03/18/2021	No Industry Code Assigned
Program(s): INDUSTRIAL AND HAZARDOUS WASTE NONPERMITTED INDUSTRIAL AND HAZARDOUS WASTE MUNICIPAL SOLID WASTE NON PERMITTED	
Investigation Type: Site Assessment	Location: 204 Lawrence St
Additional ID(s):	

Address: 204 LAWRENCE ST, ANTON, TX , 79313	Local Unit: REGION 02 - LUBBOCK
	Activity Type(s): IHWOTH61 - Investigation involving non-hazardous waste only

Principal(s):

Role	Name
RESPONDENT	CHRISTOPHER WATERS
RESPONDENT	BULLDOG ENVIRONMENTAL SERVICES LLC

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	OWNER	MR CHRISTOPHER WATERS	Work (432) 413-5463
REGULATED ENTITY CONTACT	OWNER	MR CHRISTOPHER WATERS	Work (432) 413-5463

Other Staff Member(s):

Role	Name
Supervisor	JAY KEITH
Investigator	JAY KEITH

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR EQUIPMENT	Bulldog Environmental

Investigation Comments:

INTRODUCTION

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On March 18, 2021, Mr. Jay Keith, Section Manager, and Mr. Ryan Rhodes, Environmental Investigator, with the Texas Commission on Environmental Quality (TCEQ) Region 2 Lubbock Office, conducted an on-site Industrial Hazardous Waste Follow-up Investigation at Bulldog Environmental Anton UNA Site 2, the Regulated Entity (RE), owned by Christopher Waters, the Responsible Party (RP). The RE is located at 204 Lawrence Street, Anton, Hockley County, Texas.

BACKGROUND

On April 23, 2019, an anonymous complaint was received by the Lubbock Region 2 office via phone. The complainant alleged Bulldog Environmental Services was storing potassium cyanide from spill clean-ups inappropriately. The complaint was located at 213 Main Street, Anton, Hockley County, TX. On April 25-May 25, 2019, the complaint was investigated. Ms. Sara Coley, Environmental Investigator with the Texas Commission on Environmental Quality (TCEQ), assisted Mr. Jason Adams, Work Leader, with the investigation.

During the complaint investigation (1577738), it was observed that the building (213 Main St.) and an area behind the building (204 Lawrence Avenue) were not secured. The front door of the building had an unlocked screen door to the main road. The rear overhead door was missing, and the side doors were not locked (see photos 1 & 2). The building was missing the roof, exposing the containers in the building to the elements. It was observed that approximately 248 (30 & 55-gallon) drums, 51 chemical totes, 4 yellow overpack containers, and 2 poly tanks were being stored inside the building (see photos 3-19). Numerous 55-gallon drums were showing signs of distress from bulging on the top and bottoms of the drums (see photos 3-5, 7, 9, 12-14, 16, 18, 19). It is unknown what the waste contents of the containers in the building are. It was noted at least 2 drums had the tops corroded off and fallen into the drum exposing the solid waste being stored inside in violation of 30 Texas Administrative Code (TAC) §33.7(a) & §330.15(a). The drums may not be compatible with the waste stored inside. A majority of the chemical totes were observed to be empty; however, 5-6 appeared to have an unknown waste material stored inside. The overpacks appeared to contain some unknown waste. The drums, totes, overpacks, and poly tanks were not sampled due to safety concerns of the unknown contents and the bulging of the drums on one end if not both top and bottom sides. Many of the bulging drums had paint residue on the outside of the lid and sides. One of the drums had a faded label that claimed it to be universal paint and paint related waste which would indicate the waste to be hazardous in violation of 30 TAC §335.2(a) & §335.4. One of the drums was labeled Methanol. There was no other labeling on the other drums to definitively identify the contents. There was a paint and solvent odor within the area of the building where the bulging drums and totes were being stored. The drums were expanding at the time of the investigation. Loud pings could be heard coming from the drums as they heated in the sun. Bags of lime and absorbent socks were also observed in the building area. These were not protected from the elements. Some of the bags were torn open and the contents were scattered on the ground surrounding the bags and absorbent socks.

The area behind the building is being used by the RE (204 Lawrence). There was a large concrete pad that was observed to have a release of some waste substance (see photos 20-31). It appeared that one of the totes had been rinsed out on the pad and allowed to discharge onto the concrete pad and surrounding soil on the southwest and west side of the concrete pad in violation of 30 TAC §330.15(c) & §26.121(see photos 22-28). The discharge of waste onto the ground that ran off the concrete pad was also observed along the south side of the two storage buildings and along the west side where the storage building doors were located. A very strong odor of acid and/or chemical was noted in this area. Absorbent was observed in this area scattered on the concrete pad and surrounding soil (see photos 22-27). A pile of absorbent with staining was also observed on the concrete pad (see photo 22). There were 8 chemical totes in the area either on the concrete pad or to the edge on the soil. Four of these totes contained some type of waste material which appeared to be used oil in violation of 30 TAC §324.4.

It was also observed that approximately 100 chemical totes were being stored on-site at the time of the investigation, northwest of the concrete pad (see photos 32 & 33). It is unknown if all of these totes were empty by definition. On the south end of the totes was one tote that was approximately $\frac{3}{4}$ full of an unknown waste (see photo 34). There were 4 galvanized tubs that contained water and some sort of algae growth (see photo 34 -37). It is unknown if these containers have a sealed bottom or if there is bare ground on the bottom of the tubs. There was one black plastic container that had an oily sheen on the top of the waste fluid (see photo 38). There were no lids present on the four tubes or black container. These were open to the elements and rainfall could cause the containers to overflow onto the ground. It was observed that there were numerous 55-gallon drums being stored unsecured in the elements between the two storage buildings and the totes. It appeared that the drums had the lids secured except for one drum with no lid. This drum appeared to have some type of waste oil in it. None of the drums were labeled as to their contents. One overpack was observed in this area and appeared to contain some type of waste. No sampling was conducted due to safety concerns of what unknown waste was discharged on the

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ground with such a strong chemical/acid odor.

On April 25, 2019, Mr. Christopher Waters, owner of the RE, was contacted concerning the complaint and the waste material being stored on-site. Mr. Waters stated that he had collected wastes from clean-up activities on roadway, Railroad Commission of Texas (RRC) spills, and paint and paint related wastes from a local manufacturer. Transporting as hazardous waste even handled as a universal waste requires a transporter authorization prior to conducted this activity in violation of 30 TAC §335.92. Mr. Waters stated that he did not have any paperwork (ie. manifests, waste determinations, work orders or disposal receipts) for the waste containers being stored at the RE in violation of §335.15, §335.10 and §335.11.

Mr. Waters was given contact information for the TCEQ Lubbock Region office. Mr. Waters was to contact the Lubbock Region office when he arrived back into town from his trip. Attempts to contact Mr. Waters were made on May 21 and May 24, 2019. Mr. Waters has not contacted the Lubbock Region office since the original conversation via phone on April 25, 2019. On July 17, 2019, an Exit Interview Form with the above identified alleged violations was emailed to Mr. Waters. A Notice of Enforcement letter was sent to the RE on July 17, 2019.

On September 14, 2020, a Data Maintenance File Review was conducted to update the property ownership information and reflect the 204 Lawrence Street property is owned by Mr. Waters and separate the waste located on-site by address.

GENERAL FACILITY AND PROCESS INFORMATION

The complaint location is surrounded by commercial businesses and residences. It is located within a half mile of the Anton School. Bulldog Environmental Services LLC was an environmental clean-up company. According to the company's website, they did various clean-up activities for RRC regulated sites, spills and releases from accidents covered by the TCEQ, and bioremediation on-site for petroleum releases.

ADDITIONAL INFORMATION

On March 18, 2021, Messrs. Keith and Rhodes arrived on-site at approximately 1430 hours to count drums and totes left on location. The meteorological conditions taken from the Weather Underground website (www.wunderground.com) were as follows: the temperature was approximately 60 degrees Fahrenheit, with winds ranging between 15-20 miles per hour from the north. The Multi-RAE meter was used while on-site and indicated 0 parts per million [ppm] of Volatile Organic Compounds, 0 ppm of Carbon Monoxide, 0 ppm of Hydrogen Sulfide were present, the lower explosive limit percentage never changed from 0, and the oxygen levels never dropped below 20.0 percent. This site assessment was conducted as a result of the EPA working with Scott Manufacturing and removing barrels that belonged to them for proper disposal. No barrels or totes associated to this property were removed during the activity.

As March 18, 2021, there are 71 totes, 20 55-gallon barrels/overpacks, approximately 4-5 5-gallon buckets, 1 roll-off waste oil container, 6 open-top bioremediation containers, and 2 locked buildings (with contents unknown) on-site.

No Violations Associated to this Investigation

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Signed



Environmental Investigator

Date 5/13/2021

Signed

Supervisor

Date _____

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

☒ Photographs

___ Correspondence from the facility

___ Other (specify) : _____

List of Attached files

Bulldog Environmental Anton Lawrence Additional Pics.docx

Bulldog Environmental Services UNA Site Pics.docx

Bulldog Environmental UNA Site Pics.docx